

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. <u>14-</u>
<b>v.</b>	:	DATE FILED: _____
<b>WILLIAM S. DAHL</b>	:	<b>VIOLATIONS:</b>
	:	18 U.S.C. § 2422(b) (use of an interstate
	:	commerce facility to entice a minor to
	:	engage in sexual conduct - 1 count)
	:	18 U.S.C. § 2422(a) (attempted enticement
	:	of a minor to travel in interstate
	:	commerce to engage in sexual activity – 1
	:	count)
	:	18 U.S.C. § 1470 (transfer of obscene
	:	material to minors – 1 count)
	:	18 U.S.C. § 2260A (commission of felony
	:	offense involving a minor while registered
	:	as a sex offender – 1 count)
		Notice of forfeiture

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From on or about October 23, 2013 through on or about November 21, 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, the defendant,

**WILLIAM S. DAHL,**

used a facility and means of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice and coerce Minor #1, who DAHL believed had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

**COUNT TWO**

From on or about October 23, 2013 through on or about November 21, 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, the defendant,

**WILLIAM S. DAHL,**

did knowingly persuade, induce, entice, or coerce Minor #1, who DAHL believed had not attained the age of 18 years, to travel in interstate commerce to engage in sexual activity for which any person could be charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 24, 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendant

**WILLIAM S. DAHL,**

using a means or facility of interstate commerce, knowingly transferred an obscene matter to another individual whom DAHL believed had not attained the age of 16 years, or attempted to do so.

In violation of Title 18, United States Code, Section 1470.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about October 23, 2013 through on or about November 21, 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, the defendant,

**WILLIAM S. DAHL,**

required under Delaware state law to register as a sex offender, committed offenses involving a minor, namely violations of Title 18, United States Code, Section 2422(b) and 2422(a), as charged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Section 2260A.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 2422(a) and (b), and 1470, as set forth in this indictment, defendant

**WILLIAM S. DAHL**

shall forfeit to the United States of America:

- (a) any visual depiction described in section 2256, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and
- (d) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2422(a) or (b), or 1470, including, but not limited to:

(1) Verizon LG smart phone model LG-VS840PP, serial number 306KPVH0060663, MEID HEX: A0000034745761;

(2) Cricket Samsung cell phone model SCH-R261, HEX: A0000039525077;

(3) TracPhone LG cell phone model GPLG325GB, serial number 301CYSF930966, IMEI: 012797-00-930966-4; and

(4) MP3 player with white dial, no serial number, with 1GB micro SD card, serial number A0FEC605323.

If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 2253 and 2428.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
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**ZANE DAVID MEMEGER**  
**United States Attorney**